UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

KAIST IP US LLC, Plaintiff and Counterclaim-Defendant, v. SAMSUNG ELECTRONICS CO., LTD.; SAMSUNG ELECTRONICS AMERICA, INC.; SAMSUNG SEMICONDUCTOR, INC.; SAMSUNG AUSTIN SEMICONDUCTOR, LLC; GLOBALFOUNDRIES INC.; GLOBALFOUNDRIES U.S. INC.; and QUALCOMM INC., Defendants and Counterclaim-Plaintiffs.	Case No.: 2:16-cv-01314-JRG-RSP JURY TRIAL DEMANDED Honorable Rodney Gilstrap FILED UNDER SEAL

DECLARATION OF ANDREW CHOUNG IN SUPPORT OF PLAINTIFF'S
OPPOSITION TO DEFENDANTS' MOTION TO EXCLUDE OPINION
AND TESTIMONY OF DAMAGES EXPERT ROY WEINSTEIN

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I, Andrew Choung, declare as follows:

I am a partner at Glaser Weil Fink Howard Avchen & Shapiro, LLP, and lead counsel for Plaintiff and Counterclaim-Defendant KIPB LLC, formerly known as KAIST IP US LLC ("KAIST IP US"). I submit this declaration based on my personal knowledge in support of KAIST IP US's Opposition to Defendants' Motion to Exclude Opinion and Testimony of Damages Expert Roy Weinstein. If called to testify under oath in court, I could and would testify competently to the facts stated herein.

1.   Attached hereto as Exhibit 1 is a true and correct copy of excerpts from the February 5, 2018 Expert Report of Roy Weinstein.

2.   Attached hereto as Exhibit 2 is a true and correct copy of excerpts from the Exhibits to the February 5, 2018 Expert Report of Roy Weinstein.

3.   Attached hereto as Exhibit 3 is a true and correct copy of excerpts from the Appendix to the February 5, 2018 Expert Report of Roy Weinstein.

4.   Attached hereto as Exhibit 4 is a true and correct copy of excerpts from the February 5, 2018 Expert Report of Dr. Kelin J. Kuhn.

5.   Attached hereto as Exhibit 5 is a true and correct copy of excerpts from the transcript of the March 9, 2018 deposition of Dr. Vivek Subramanian.

6.   Attached hereto as Exhibit 6 is a true and correct copy of excerpts from the March 2, 2018 Rebuttal Expert Report of Dr. Kelin J. Kuhn.

7.   Attached hereto as Exhibit 7 is a true and correct copy of excerpts from the transcript of the January 4, 2018 deposition of Dr. Srikanth Samavedam.

8.   Attached hereto as Exhibit 8 is a true and correct copy of excerpts from the February 5, 2018 Expert Report of David Witt.

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9. Attached hereto as Exhibit 9 is a true and correct copy of excerpts from the transcript of the March 15, 2018 deposition of Dr. Stephen L. Becker.

10. Attached hereto as Exhibit 10 is a true and correct copy of excerpts from the document produced in this matter as DEFTS_00004660-66.

11. Attached hereto as Exhibit 11 is a true and correct copy of excerpts from the transcript of the March 14, 2018 deposition of Roy Weinstein.

12. Attached hereto as Exhibit 12 is a true and correct copy of excerpts from the document produced as KAIST-034658-734.

13. Attached hereto as Exhibit 13 is a true and correct copy of excerpts from the March 9, 2018 Supplemental Expert Report of Dr. Stephen L. Becker.

14. Attached hereto as Exhibit 14 is a true and correct copy of excerpts from Montenegro & Torres, *Consumer Preferences and Implicit Prices of Smartphone Characteristics*, as produced in this matter and bearing Bates Nos. KAIST-029488-511.

15. Attached hereto as Exhibit 15 is a true and correct copy of excerpts from Lin & Chen, *An Analysis of the Economic Value of Mobile Phone in Taiwan*, as produced in this matter and bearing Bates Nos. KAIST-029480-87.

16. Attached hereto as Exhibit 16 is a true and correct copy of excerpts from Dewenter et al., *Hedonic Prices in the German Market for Mobile Phones*, as produced in this matter and bearing Bates Nos. KAIST-029292-301.

17. Attached hereto as Exhibit 17 is a true and correct copy of a March 11, 2018 email from Andrew Choung to Jeffrey D. Comeau.

18. Attached hereto as Exhibit 18 is a true and correct copy of excerpts of the document produced in this case as SAM_KAISTIP00058663.

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19.   Attached hereto as Exhibit 19 is a true and correct copy of a February 9, 2018 email from Guy Rodgers to Allan M. Soobert.

20.   Attached hereto as Exhibit 20 is a true and correct copy of a February 15, 2018 email from Andrew Choung to Jeffrey D. Comeau.

21.   Attached hereto as Exhibit 21 is a true and correct copy of a February 15, 2018 email from Guy Rodgers to Jeffrey D. Comeau.

22.   Attached hereto as Exhibit 22 is a true and correct copy of a February 27, 2018 email from Andrew Choung to Allan M. Soobert.

23.   Attached hereto as Exhibit 23 is a true and correct copy of excerpts from the document produced in this case as SAM_KAISTIP00000143-161.

24.   Attached hereto as Exhibit 24 is a true and correct copy of excerpts from the document produced in this case as GF_KAISTIP00000173-214.

25.   Attached hereto as Exhibit 25 is a true and correct copy of excerpts from the transcript of the December 15, 2017 deposition of Vasisht "Vic" Mantra Vadi.

26.   Attached hereto as Exhibit 26 is a true and correct copy of excerpts from document produced in this case as GF_KAISTIP00000317-400.

27.   Attached hereto as Exhibit 27 is a true and correct copy of excerpts from the transcript of the November 16, 2017 deposition of Dongwon Kim.

28.   Attached hereto as Exhibit 28 is a true and correct copy of *Overfitting Regression Models: Problems, Detection, and Avoidance*, STATISTICS BY JIM (May 26, 2017), http://statisticsbyjim.com/regression/overfitting-regression-models/.

29.   Attached hereto as Exhibit 29 is a true and correct copy of *Just Poor Accuracy,* DATA MINING & PREDICTIVE ANALYTICS (May 1, 2014), http://abbottanalytics.blogspot.com/

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2014/05/why-overfitting-is-more-dangerous-than.html.

30.   Attached hereto as Exhibit 30 is a true and correct copy of excerpts from the document produced in this case as QC_KAISTIP_0002519, as cited in the expert report of David Witt.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 2nd day of April, 2018, in Los Angeles, California.

/s/ Andrew Choung
Andrew Choung

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